

**Meeting Minutes of Rule Revision Workgroup
WAC 246-203-120 -- Dead Animal (and Refuse) Disposal
May 26, 2005 – Kent, WA**

On May 26, 2005, the State Board of Health (SBOH) and Department of Health (DOH) held a meeting in Kent, Washington, with personnel from other governmental agencies, representatives of segments of the livestock industry, and others interested in the rules for disposal of dead animals. The purpose of the meeting was to gain input about the possible need to revise WAC 246-203-120 of the SBOH. The attendees formed a workgroup to brainstorm ideas for a possible revision of the rule.

NAME	ORGANIZATION	E-MAIL ADDRESS
Bill Heaton	Public Health – Seattle & King County	bill.heaton@metrokc.gov
Sharon Hopkins	Public Health – Seattle & King County	sharon.hopkins@metrokc.gov
John Larson	Washington Assoc. of Conservation Districts	wacd-exec@wa.nacdn.net
Trey Vincent	Englar Food Laboratory	tvincent@gcpower.net
Brad Leamaster	USDA – APHIS - VS	Brad.R.Leamaster@aphis.usda.gov
Nora Mena	Wash. State Dept. Agr.	nmena@agr.wa.gov
Janis Joslin	Wash. State Dept. Agr.	jjoslin@agr.wa.gov
Dave Hodgeboom	Wash. State Dept. Agr.	dhodgeboom@agr.wa.gov
Joe Harrison	Wash. State University	jhh@wsu.edu
John Storman	Wash. Dept. Ecology	jsto461@ecy.wa.gov
Laurie Davies	Wash. Dept. Ecology	Ldav461@ecy.wa.gov
Kevin Barry	Klickitat County Health Dept.	kevinb@co.klickitat.wa.us
Patrick Rich	USDA – FSIS	Patrick.Rich@usda.gov
Linda Jonasson	Wash. State Sheep Producers	jonasson.farm@verizon.net
D R Jonasson	Wash. State Sheep Producers	jonasson.farm@verizon.net
Eileen Hordyk	Wash. State Sheep Producers	ghordyk@comcast.net
Greg Hordyk	Wash. State Sheep Producers	ghordyk@comcast.net
Heather Hanson	Wash. Cattle Feeders	heatherhh@qwest.net
Meg VanSchoorl	Wash. State House of Representatives	vanschoorl.meg@leg.wa.gov
Conrad Boulton	Wash. State Veterinary Assoc.	CHBDVM@Pilchuckvet.com
Leslie Spangler	Wash. State Dept. Health	Leslie.spangler@doh.wa.gov
Maryanne Guichard	DOH	maryanne.guichard@doh.wa.gov
Ned Therien	WSBOH	ned.therien@doh.wa.gov

Ned Therien, SBOH, gave a synopsis of Washington State laws and rules of different agencies that control the disposal of dead animals. He pointed out that the State Board of Health's rule was intended to be a tool for local health officers to deal with public health nuisance situations. It pre-dates some rules and programs administered by Washington State Department of Agriculture (WSDA) and Department of Ecology that also address the issue.

Nora Mena, WSDA, provided an overview of Substitute Senate Bill 5602, adopted in 2005. This new law establishes some requirements for WSDA and Ecology, in consultation with DOH, to develop guidelines for livestock producers regarding the composting of bovine and equine carcasses. The guidelines must consider restrictions for animals thought to be affected by prion-protein disease or anthrax.

David Hodgeboom, WSDA, gave a presentation about ongoing planning to prepare for the possible emergency handling of animal carcasses due to natural or man-made disaster. This includes planning for dealing with emergencies resulting from the importation of a highly contagious animal disease. He made the point that emergency disposal might use methods not allowed for routine animal disposal situations.

During its discussion, the workgroup established some basic goals for the revision of WAC 246-203-120:

- Improve clarity of the rule;
- Eliminate conflicts with other laws/rules; and
- Try to use the same language as in other laws/rules where reasonable.

The workgroup discussed some specific ways to help achieve the goals. Clarity and compatibility between rules of different agencies would be increased by adding landfilling, rendering, and composting to the methods of carcass disposal currently allowed by the rule: burial and incineration.

A phrase such as "or other method approved by the local health officer" would provide flexibility to deal with differing climatic, geological, and population density situations.

Burial depth for diseased animals must be compatible with the 3 feet required in RCW 16.68.020. However, that depth is not necessary for public health protection for non-diseased animals, especially small pets. Perceived conflict could be remedied regarding burial depth by keeping 2 feet, except animals that have died or been killed because of disease must be buried 3 feet deep. The group considered the use of unslaked lime when burying a diseased animal to be unnecessary if the animal was buried at least 3 feet deep.

Wording should be revised to be the same or similar to that used in other agencies' laws/rules.

Provisions for "offal" should be moved from subsection (2) to subsection (3) because offal is part of a dead animal.

The composting of carcasses affected by the most significant diseases reportable to the State Veterinarian (which include anthrax and BSE) should be prohibited according to the provisions of SSB 5602.

A performance standard should be added for protecting ground water, such as a statement: "sufficiently above ground water to prevent contamination of the water table."

Remove the last sentence requiring the local board of health to dispose of a dead animal if the dead animal is on public space. This should more properly be the responsibility of the property owner, including a public entity.

Final disposition of carcasses is often not achievable within 24 hours because renderers need more time to pick them up.

The group agreed that their most significant concerns could be remedied if the above issues were addressed in a revision of the rule.

Ned Therien concluded the meeting with a promise to send out a first draft revision proposal for comment in June.

Ned Therien.
Health Policy Analyst
Washington State Board of Health
ned.therien@doh.wa.gov